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WA 2917
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ADMINISTRATIVE RECORD
ITEM NUMBER
TOTAL NUMBER OF PAGES

12/20/1991

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December 20, 1991

David Croxton
Environmental Engineer
US Environmental Protection Agency, Region X
1200 Sixth Avenue
MS/HW-112
Seattle WA 98101

Re: Organic Air Emissions Monitoring Program at the Pier 91 Facility.

Dear Mr. Croxton;

As we discussed in our phone conversation on December 13, 1991, the Organic Air Emissions Program is being revised to answer the concerns you expressed in your letter of Nov. 11, 1991 after your review of the written program.

The written program is being revised to specify that the Calibration Precision Test will be performed quarterly, before the monitor is placed into service each quarter. The Program will also state that the results of the Calibration Precision Test must be 10 percent or less for the monitor to be placed into service.

Equipment subject to the requirements of 40 CFR 264 (and 265) subpart BB are currently identified as monitoring locations on the diagram in the recordkeeping section of the written program description. As we discussed, the individual monitoring points have not as yet been assigned unique identifying numbers. As a program is underway to assign identification numbers to all equipment at each Burlington Environmental facility, we are waiting until the Pier 91 Facility has completed the numbering process before a list of equipment is included in the written program description. Until the numbers are assigned in a systematic way, such a list would be confusing and misleading. In the meantime, the diagrams clearly identify the affected equipment as required by the applicable regulation. However, the diagrams will be revised to be more descriptive and more easily understood.

The written program will also be revised to reflect the operational decision to assume that potential leaks discovered by sensory means will be considered leaks under

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this program and will be repaired according to the regulatory schedule. First attempts at repair will be made within five days and repairs will be completed within fifteen days of detection, except when delays are allowed by the regulation.

If you have any questions or comments about this program please call me at (206) 835-8594 or John Stiller at (206) 223-0500.

Sincerely,



Loren W. Makus
Environmental Engineer

cc: John Stiller